



January 10, 2005
(Via certified or express mail)

Mr. Kevin Turner-Environmental Scientist, OSC
U. S. Environmental Protection Agency
c/o Crab Orchard National Wildlife Refuge
8588 Rt. 148
Marion, IL 62959

Mr. Thomas Martin, Esq.
Associate Regional Counsel
77 West Jackson Boulevard (C-14J)
Chicago, IL 60604-3590

**Re: Sauget Sites Area I - May 31, 2000 Unilateral Administrative Order (UAO)
Sediment / Soils Removal Action
Monthly Report; December 1 – December 31, 2004 Reporting Period**

Dear Mr. Turner and Mr. Martin,

Enclosed is the Monthly Report for the Sauget Sites Area I May 31, 2000 Unilateral Administrative Order ("UAO") Sediment Removal Action. This submittal is in fulfillment of the monthly reporting requirements of the UAO, Section V, and paragraph 3.4. Reporting and covers the period from December 1 to December 31 2004.

Sincerely,

Steven D. Smith
Project Coordinator

cc: Nabil Fayoumi – USEPA Region 5
Sandra Bron - IEPA
Mike Coffey - USFW
Richard Williams - Solutia
Cathleen Bumb - Solutia
Mayor Frank Bergman - Cahokia
Village of Sauget – c/o P. H. Weis & Associates (Attn: Brian Nelson)
Mayor R. Sauget - Sauget, IL
L. Glen Kurowski- Monsanto
Linda Tape - Husch & Eppenberger

Sauget Sites Area I - Sauget, Illinois

May 31, 2000 UAO – Dead Creek Sediment Removal Action

Status Report

Date of Report: January 10, 2005
Period Covered: December 1, 2004 – December 31, 2004

Work Performed During the Reporting Period

Groundwater Monitoring

- *Revision 01 of the Draft Groundwater Monitoring Plan - submitted to the Agencies on August 3, 2001. Although it has not received Agency approval, it has been implemented.*

TSCA Containment Cell

- *The Operations and Maintenance Report - submitted for the Agencies' review and approval on August 28, 2001- remain under review. Portions of the Plan applicable to the placement of sediments have already been approved.*
- Performed inspections of the site.
- Inspected and maintained the 6oz. geotextile/6 mil scrim reinforced poly cover over the containment cell.
- Maintained stormwater and leachate collection controls around the containment cell.
- Monitored support area facilities.
- Obtained fourth quarter 2004 samples from the groundwater monitoring wells around the cell.

Dead Creek

At a meeting held on April 20, 2004, the U.S. EPA requested a conceptual plan for completion of the removal of the bottom soils in Dead Creek. That plan was to be based on soil removal in Creek Sectors F and D and, if sufficient room exists in the containment cell, excavation of portions of in Creek Sector B. The plan was submitted to the Agencies on May 17, 2004. Conditional approval for removal of additional soils from Creek Sectors F, D, and B and for construction of the final cover on the sediment containment cell was received in a letter dated September 14, 2004. The letter also

approved the installation of a liner in Creek Sector B, provided the U.S. EPA separately approves the design of the liner system. A schedule for implementation of the work was submitted to the EPA on September 30, 2004 and was approved by the Agency on October 11, 2004.

A contract was awarded to Philip Services Corporation (PSC) of Columbia, Illinois to perform the creek dewatering work. PSC completed mobilization by the end of October and started pumping water from Creek Sectors B and F in November. PSC were also awarded a separate contract for the excavation of the creek bottom soils in Creek Sectors B, D, and F.

Creek bottom soil sampling was completed Creek Sector D by the end of October. These samples were sent to the laboratory for PCB analyses and sample splits were also submitted for immunoassay screening. The screening results were received in early November and indicated that only the surficial (0-1 foot depth range) soils at one location contained PCBs in excess of 0.5 ppm. Laboratory test results were received on December 8th. Those results demonstrated that the PCB concentrations in all of the samples were below the level of concern of 0.58 ppm, with the highest concentration being 0.16 ppm in the same sample that screened higher than 0.5 ppm. Because of the apparent difference between these results and the results obtained from the post excavation sampling carried out in 2002, the Agency requested Solutia to prepare a Technical Memorandum comparing the two sets of results and discussing the possible reasons for any significant differences.

Creek Sector F was pumped down by the last week of November and sampling in the bottom of the creek began on November 29th and was completed on December 3rd. The samples were screened for zinc content using X-ray fluorescence and were sent to the laboratory for zinc analyzes. Those analytical results are expected in the first week of January.

A meeting was held with the Agencies and with the State and County Highway Departments to discuss road and drainage improvement works that the County intends to construct on Judith Lane in 2005. It was agreed that we would provide the County with details of the lining system design by the first week of December and those details were submitted to the County on December 2nd. The County will include them in their bid documents, in the expectation that the road works contractor will have to restore the lining at the culvert locations on the upstream side of Judith Lane. It was also agreed to excavate between 70 and 90 cubic yards of soil from the creek to permit culvert extensions to be constructed by the County. The Highway Department will be responsible for staking out the excavation locations and grades and the excavated material will be placed in the TSCA containment cell on Judith Lane.

Comments on the Creek Bottom Soil Removal Action Work Plan were received from the Agency on November 10th. Draft responses to those comments were submitted to the Agency for review on November 23rd.

Data Submittal

No data are submitted with this report.

Work Scheduled for Next Reporting Period

- Conduct routine inspection of the containment cell.
- Continue operation of the stormwater treatment system.
- Perform necessary operation and maintenance activities on the containment cell and temporary treatment system.
- Complete analyses of fourth quarter 2004 groundwater samples from monitoring wells.
- Review and validate analytical data from soil samples in Creek Sector F.
- Finalize the designs for the lining in Creek Sector B.
- Prepare and submit a Technical Memorandum to the Agency comparing the results of the sampling in Creek Sectors D and F to the results from the post excavation sampling carried out in 2002. This memorandum will include recommendations for the limits of excavation in Creek Sectors B, D, and F.

PROJECT COMPLETION

Mobilization	100 %
Berm Construction	100 %
Liner Installation	100 %
Sediment Removal Preparation	100 %
Sediment Excavation (Site M)	100 %
Sediment Excavation (Original Scope of Work)	100 %
Sediment Excavation (Sector F)	100 %
Temporary Cover installation	100 %
Demobilization - Phase I	100 %
Final Cover Installation	0 %
Demobilization - Phase II	0 %
Final Report Preparation	0 %